

EXHIBIT 1

From: robin.cheng@glacier.law
Sent: Tuesday, November 2, 2021 7:47 AM
To: Neil Nandi; Iris Ju; Tao Liu; Tom.聽M
Cc: Adam Kelly; Marwa Abdelaziz; Arthur Yuan
Subject: Re: RE: Violation of Preliminary Injunction - Case No. 20-cv-4806

This email originated from outside of Loeb's Network.

Counsel,

We are in receipt of the excel forms you attached and will communicate with Defendants regarding your concerns.

If there is any violation by Defendants, we will urge Defendants to comply with the preliminary injunction order immediately.

Regards,

Robin Cheng | Attorney

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New York, NY 10166
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From: [Neil Nandi](#)
Date: 2021-10-29 23:07
To: robin.cheng@glacier.law; [Iris Ju](#); [Tao Liu](#); [Tom.聽M](#)
CC: [Adam Kelly](#); [Marwa Abdelaziz](#); [Arthur Yuan](#)
Subject: RE: Violation of Preliminary Injunction - Case No. 20-cv-4806
Counsel:

We write to direct your attention to your clients' continuing violation of the preliminary injunctions and ongoing infringement of the Patents-in-Suit in Case No. 20-cv-4806. Specifically, we have observed sales activities on Amazon.com and Walmart.com since October 21, as noted in the attached.

To comply with the injunctions, these listings on these online sites, as well as any others, must be taken down immediately. We expect that you will report sales from these listings when providing the other sales reports ordered by the Court (Dkt. 469) on November 1.

Regards,

Neil

Neil Nandi
Attorney At Law



321 North Clark Street, Suite 2300 | Chicago, IL 60654

Direct Dial: [312.464.3109](tel:312.464.3109) | **Fax:** [312.275.8505](tel:312.275.8505) | **E-mail:** nnandi@loeb.com

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From: Neil Nandi

Sent: Tuesday, October 19, 2021 5:06 PM

To: robin.cheng@glacier.law; Iris Ju <iris.ju@glacier.law>; Tao Liu <tao.liu@glacier.law>; Tom.聽M <ruoting.men@glacier.law>

Cc: Adam Kelly <akelly@loeb.com>; Marwa Abdelaziz <mabdelaziz@loeb.com>; Arthur Yuan <ayuan@loeb.com>

Subject: Violation of Preliminary Injunction - Case No. 20-cv-4806

Counsel,

As you know, the Court entered a preliminary injunction in Case No. 20-cv-4806 last week. Paragraph 4 of the order required Gyroor.com and Gyroorboard.com to remove the infringing products identified on Exhibit C within three days. Six days have now passed and all of the items identified on Exhibit C are still listed and being offered for sale on those websites. In fact, some are even subject to discounts and sale pricing, suggesting that the defendants are attempting to improperly deplete infringing inventory.

Because of this continued and clear violation of the preliminary injunction order, Plaintiffs intend to move for contempt against Gyroor under LR 37.1 and will seek their fees when so doing, which is a remedy this Court previously ordered in Dkt. 444. Plaintiffs will file their motion on October 26. We have no objection to Defendants having until November 1 to respond, with our reply due on November 5. We do not believe a meet and confer would serve any purpose in light of Gyroor's repeated violations of court orders, including the earlier-entered injunction. However, if you believe that some purpose would be served by a meet and confer, please identify what that is beforehand. I am currently available between 10:30 AM and 11:30 AM tomorrow, and from 10 AM to 12 PM on each Thursday and Friday.

Neil

| # | Listing item number | Brand | Seller | Listing link |
|----|---------------------|--------|--|---|
| 1 | 484977122 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G11-Hoverboard-Off-Road-All-Terrain-6-5-Two-Wheel-Flash-LED-Light-Self-Balancing-Bluetooth-Music-Speaker-UL-2272-Certified-Kids-Adults-Gift/484977122?athbdg=L1700 |
| 2 | 432370144 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS81-6-5-inch-off-Road-Bluetooth-Hoverboard-With-Hoverboard-Seat-Attachment-UL2272-Certified-Blue/432370144 |
| 3 | 442597675 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS81-6-5-inch-off-Road-Bluetooth-Hoverboard-With-Hoverboard-Seat-Attachment-UL2272-Certified-Blue/442597675 |
| 4 | 442026651 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-Warrior-Off-Road-Hoverboard-8-5-inch-Self-Balancing-Scooter-with-Bluetooth-Speakers-and-LED-Lights-UL2272-Certified-Blue/442026651 |
| 5 | 768549987 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-Warrior-Off-Road-Hoverboard-8-5-inch-Self-Balancing-Scooter-with-Bluetooth-Speakers-and-LED-Lights-UL2272-Certified-Blue/768549987 |
| 6 | 573104259 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-Warrior-Off-Road-Hoverboard-8-5-inch-Self-Balancing-Scooter-with-Bluetooth-Speakers-and-LED-Lights-UL2272-Certified-Blue/573104259 |
| 7 | 153321597 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G5-off-Road-Hoverboard-for-Kids-and-Adults-6-5-Self-Balancing-Hoverboards-with-Bluetooth-Speaker-UL2272-Certified-Black/153321597 |
| 8 | 390019956 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G5-off-Road-Hoverboard-for-Kids-and-Adults-6-5-Self-Balancing-Hoverboards-with-Bluetooth-Speaker-UL2272-Certified-Black/390019956 |
| 9 | 950180648 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS81-6-5-inch-off-Road-Hoverboard-With-Two-Wheel-Self-Balancing-Scooter-UL2272-Certified-Blue/950180648 |
| 10 | 567918541 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G11-off-Road-Hoverboard-6-5-Two-Wheel-Flash-LED-Light-with-Bluetooth-Speaker-UL2272-Certified-Blue/567918541?athbdg=L1700 |
| 11 | 943780262 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G11-off-Road-Hoverboard-6-5-Two-Wheel-Flash-LED-Light-with-Bluetooth-Speaker-UL2272-Certified-Blue/943780262 |
| 12 | 693778837 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS80-Hoverboard-for-Kids-6-5-inch-Self-Balancing-Scooter-with-Music-Speaker-LED-Lights-UL2272-Certified-Pink/693778837 |
| 13 | 442597675 | Gyroro | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS80-Hoverboard-for-Kids-6-5-inch-Self-Balancing-Scooter-with-Music-Speaker-LED-Lights-UL2272-Certified-Pink/442597675 |

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| 1 | 484977122 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G11-Hoverboard-Off-Road-All-Terrain-6-5-Two-Wheel-Flash-LED-Light-Self-Balancing-Bluetooth-Music-Speaker-UL-2272-Certified-Kids-Adults-Gift/484977122?athbdg=L1700 |
| 2 | 432370144 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS81-6-5-inch-off-Road-Bluetooth-Hoverboard-With-Hoverboard-Seat-Attachment-UL2272-Certified-Blue/432370144 |
| 3 | 445297675 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS81-6-5-inch-off-Road-Bluetooth-Hoverboard-With-Hoverboard-Seat-Attachment-UL2272-Certified-Blue/445297675 |
| 4 | 442026651 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-Warrior-Off-Road-Hoverboard-8-5-inch-Self-Balancing-Scooter-with-Bluetooth-Speakers-and-LED-Lights-UL2272-Certified-Blue/442026651 |
| 5 | 768549987 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-Warrior-Off-Road-Hoverboard-8-5-inch-Self-Balancing-Scooter-with-Bluetooth-Speakers-and-LED-Lights-UL2272-Certified-Blue/768549987 |
| 6 | 573104259 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-Warrior-Off-Road-Hoverboard-8-5-inch-Self-Balancing-Scooter-with-Bluetooth-Speakers-and-LED-Lights-UL2272-Certified-Blue/573104259 |
| 7 | 153321597 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G5-off-Road-Hoverboard-for-Kids-and-Adults-6-5-Self-Balancing-Hoverboards-with-Bluetooth-Speaker-UL2272-Certified-Black/153321597 |
| 8 | 390019956 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G5-off-Road-Hoverboard-for-Kids-and-Adults-6-5-Self-Balancing-Hoverboards-with-Bluetooth-Speaker-UL2272-Certified-Black/390019956 |
| 9 | 950180648 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS81-6-5-inch-off-Road-Hoverboard-With-Two-Wheel-Self-Balancing-Scooter-UL2272-Certified-Blue/950180648 |
| 10 | 567918541 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G11-off-Road-Hoverboard-6-5-Two-Wheel-Flash-LED-Light-with-Bluetooth-Speaker-UL2272-Certified-Blue/567918541?athbdg=L1700 |
| 11 | 943780262 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-G11-off-Road-Hoverboard-6-5-Two-Wheel-Flash-LED-Light-with-Bluetooth-Speaker-UL2272-Certified-Blue/943780262 |
| 12 | 697378837 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS80-Hoverboard-for-Kids-6-5-inch-Self-Balancing-Scooter-with-Music-Speaker-LED-Lights-UL2272-Certified-Pink/697378837 |
| 13 | 445297675 | Gyroor | Shenzhen Chetaidou Keji Youxian Gongsi | https://www.walmart.com/ip/GYROOR-TS80-Hoverboard-for-Kids-6-5-inch-Self-Balancing-Scooter-with-Music-Speaker-LED-Lights-UL2272-Certified-Pink/445297675 |

| # | New ASIN | Store Merchant ID | Store Name |
|----|------------|-------------------|----------------|
| 1 | B08NF4CYNQ | A1UDUI19G4J00M | xingrunde-us |
| 2 | B09BNM2386 | A1UDUI19G4J00M | xingrunde-us |
| 3 | B07799VQ8R | A1UDUI19G4J00M | xingrunde-us |
| | | | |
| 4 | B07WPK7KY3 | A2OC7452IMNYIC | ruishanghui-us |
| 4 | B07WPK7KY3 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 5 | B07SJLP7JB | A7J5NTHTGJZ1Y | xingkanglai-us |
| 6 | B07S5LCF22 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 7 | B07SJLNJ33 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 8 | B07S73CT8F | A7J5NTHTGJZ1Y | xingkanglai-us |
| | | | |
| 9 | B07FY61ZJM | A2AQ9QHLQ58M0 | shibangan-us |
| 10 | B07FY4VTV3 | A2AQ9QHLQ58M0 | shibangan-us |
| 11 | B07SHG85WW | | |
| | | | |
| 12 | B0779826VN | A1E4KZM7T8SBIX | fanzhongda-us |

| # | New ASIN | Store Merchant ID | Store Name |
|----|------------|-------------------|----------------|
| 1 | B08NF4CYNQ | A1UDUI19G4J00M | xingrunde-us |
| 2 | B09BNM2386 | A1UDUI19G4J00M | xingrunde-us |
| 2 | B09BNM2386 | A3C03X9QJLWAJO | guirong-us |
| 3 | B07799VQ8R | A1UDUI19G4J00M | xingrunde-us |
| 4 | B07799FSJQ | A1UDUI19G4J00M | xingrunde-us |
| | | | |
| 5 | B07WPK7KY3 | A2OC7452IMNYIC | ruishanghui-us |
| 5 | B07WPK7KY3 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 6 | B07SJLP7JB | A7J5NTHTGJZ1Y | xingkanglai-us |
| 7 | B07S5LCF22 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 8 | B07SJLNJ33 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 9 | B07S73CT8F | A7J5NTHTGJZ1Y | xingkanglai-us |
| 10 | B07WDNPYHD | A7J5NTHTGJZ1Y | xingkanglai-us |
| | | | |
| 11 | B07FY61ZJM | A2AQ9QHLQ58M0 | shibangan-us |
| 12 | B07FY4VTV3 | A2AQ9QHLQ58M0 | shibangan-us |
| 13 | B07SHG85WW | A2AQ9QHLQ58M0 | shibangan-us |
| 14 | B08HW9TTBG | A2AQ9QHLQ58M0 | shibangan-us |
| | | | |
| 15 | B0779826VN | A1E4KZM7T8SBIX | fanzhongda-us |

| # | New ASIN | Store Merchant ID | Store Name |
|----|------------|-------------------|----------------|
| 1 | B08NF4CYNQ | A1UDUI19G4J00M | xingrunde-us |
| 2 | B09BNM2386 | A1UDUI19G4J00M | xingrunde-us |
| 2 | B09BNM2386 | A3C03X9QJLWAJO | guirong-us |
| 3 | B07799VQ8R | A1UDUI19G4J00M | xingrunde-us |
| 4 | B07799FSJQ | A1UDUI19G4J00M | xingrunde-us |
| | | | |
| 5 | B07WPK7KY3 | A2OC7452IMNYIC | ruishanghui-us |
| 5 | B07WPK7KY3 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 6 | B07SJLP7JB | A7J5NTHTGJZ1Y | xingkanglai-us |
| 7 | B07S5LCF22 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 8 | B07SJLNJ33 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 9 | B07S73CT8F | A7J5NTHTGJZ1Y | xingkanglai-us |
| 10 | B07WDNPYHD | A7J5NTHTGJZ1Y | xingkanglai-us |
| | | | |
| 11 | B07FY61ZJM | A2AQ9QHLQ58M0 | shibangan-us |
| 12 | B07FY4VTV3 | A2AQ9QHLQ58M0 | shibangan-us |
| 13 | B07SHG85WW | A2AQ9QHLQ58M0 | shibangan-us |
| 14 | B08HW9TTBG | A2AQ9QHLQ58M0 | shibangan-us |
| 15 | B07PKSK93G | A2AQ9QHLQ58M0 | shibangan-us |
| 16 | B07PLSJRGQ | A2AQ9QHLQ58M0 | shibangan-us |
| | | | |
| 17 | B0779826VN | A1E4KZM7T8SBIX | fanzhongda-us |

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| 2 | B09BNM2386 | A1UDUI19G4J00M | xingrunde-us |
| 3 | B07799VQ8R | A1UDUI19G4J00M | xingrunde-us |
| 4 | B07799FSJQ | A1UDUI19G4J00M | xingrunde-us |
| 5 | B09CH742WZ | A1UDUI19G4J00M | xingrunde-us |
| | | | |
| | | | |
| 6 | B07WPK7KY3 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 7 | B07SJLP7JB | A7J5NTHTGJZ1Y | xingkanglai-us |
| 8 | B07S5LCF22 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 9 | B07SJLNJ33 | A7J5NTHTGJZ1Y | xingkanglai-us |
| 10 | B07S73CT8F | A7J5NTHTGJZ1Y | xingkanglai-us |
| 11 | B07WDNPHYD | A7J5NTHTGJZ1Y | xingkanglai-us |
| | | | |
| 12 | B07FY61ZJM | A2AQ9QHLQ58M0 | shibangan-us |
| 13 | B07FY4VTV3 | A2AQ9QHLQ58M0 | shibangan-us |
| 14 | B07SHG85WW | A2AQ9QHLQ58M0 | shibangan-us |
| 15 | B08HW9TTBG | A2AQ9QHLQ58M0 | shibangan-us |
| 16 | B07PKSK93G | A2AQ9QHLQ58M0 | shibangan-us |
| 17 | B07PLSJRGQ | A2AQ9QHLQ58M0 | shibangan-us |
| | | | |
| 18 | B0779826VN | A1E4KZM7T8SBIX | fanzhongda-us |